

EXHIBIT B

Exhibit B

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11 Attorneys for Plaintiff,

Aylus Networks, Inc.

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

16 AYLUS NETWORKS, INC., a Delaware
17 corporation,

18 Plaintiff,

19 vs.

20 APPLE, INC., a California corporation

21 Defendant.

CASE NO. 3:13-cv-04700-EMC

**PLAINTIFFS' 4-2 PRELIMINARY
CLAIM CONSTRUCTIONS AND
INTRINSIC AND EXTRINSIC
EVIDENCE**

22
23
24 Pursuant to Patent Local Rule 4-2, Aylus Networks, Inc. ("Aylus") provides in Exhibit A
25 its preliminary claim constructions and intrinsic and extrinsic evidence for the terms proposed by
26 the parties under Patent Local Rule 4-1. Citations to specific sections of a document are
27 exemplary, not exhaustive, and are intended to indicate the nature of the reference. Citations to a
28 specific portion of a document do not limit or prejudice Aylus' right to rely on any other portion

1 of the document.

2 Citations to a figure include all discussion in the relevant specifications and file histories
3 relating to the figure. Citations for terms that relate to other proposed terms for construction are
4 included in the evidence for the other, related proposed terms for construction. All claims and
5 elements thereto related to any proposed term for construction may be used in construing any
6 other proposed term for construction.

7 Aylus bases these constructions upon its current knowledge, understanding, and belief as
8 to the facts and information available as of this date. Aylus reserves the right to revise its
9 proposed constructions and intrinsic and extrinsic evidence in view of
10 Apple's Patent Local Rule 4-2 Disclosure and as discovery proceeds. Aylus further reserves the
11 right to rely on intrinsic and extrinsic evidence identified by Apple and to add additional extrinsic
12 evidence, particularly for constructions on which the parties disagree.

13 Aylus also reserves the right to separate a word or phrase from the proposed terms in order
14 to clarify the issues for the Court. Aylus reserves the right to add or delete terms, phrases, and/or
15 clauses for construction, or otherwise amend its preliminary claim constructions and related
16 disclosures as needed, including to reflect any changes made as a result of the discussions between
17 the parties.

18 In addition to the references identified in Exhibit A, and while Aylus does not believe that
19 expert testimony is necessary, Aylus reserves the right to use expert testimony in rebuttal to
20 respond to any arguments raised by Apple or its experts.

21
22
23 DATED: July 17, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

24
25
26 By /s/ Amar L. Thakur
Amar L. Thakur

27 Attorneys for Plaintiff, Aylus Networks, Inc.
28

EXHIBIT A

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
wide area network	An electronic communication network that connects nodes in a large geographical area.	<p>All citations in this Exhibit A related to “network,” including “local area network,” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘753 patent, including cols. 5:35-52; 17:7-32; 17:60-63; 18:32-41</p> <p>Figures 1, 4, 6, 10-13, 17</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner’s Amendment</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no.</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Dictionary of Computing & Communications (2003) at 409</p> <p>Random House Webster's Dictionary (2001) at 820</p> <p>Webster's New World Computer Dictionary (2003) at 389</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		Oxford Dictionaries Online (2014) ("Wide Area Network" and "Network")
local area network	An electronic communication network that connects devices in a small geographic area.	<p>All citations in this Exhibit A related to "network," including "wide area network," are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 5:14-24; 18:32-41; 23:4-7.</p> <p>Figure 1, 3, 4, 10, 11, 12, 14-17.</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>7/24/2008 Office Action</p> <p>4/21/2009 Office Action</p> <p><u>Extrinsic:</u></p> <p>Dictionary of Computing & Communications (2003) at 215</p> <p>Merriam Webster Online Dictionary (2014) (“Local Area Network”)</p> <p>Oxford Dictionaries Online (2014) (“Local Area Network”)</p> <p>Random House Webster’s Dictionary (2001) at 423</p> <p>Webster’s New World Computer Dictionary (2003) at 215</p>
media content	Audiovisual content.	<p>All citations in this Exhibit A related to “media,” including “media server” or “media renderer,” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5: 42-6:42; 12:32-14:27; 15:14-27; 15:36-37; 16:14-17:59; 18:8-13; 18:42-50; 21:7-13; 22:22-47; 23:4-23; 23:62-63</p> <p>Figures 6, 7, 9, 10-12, 14-17</p> <p>The prosecution history of the ‘753 patent, including</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Random House Webster's Dictionary (2001) at 448</p> <p>Webster's New World Computer Dictionary (2003) at 233</p>
remote from the UE	Not located on the same local area network as the UE.	<p>All citations in this Exhibit A related to "network" or "UE" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 1:34-37; 2:64-3:11; 3:42-4:14; 5:49-6:42; 6:56-8:9; 8:35-61; 9:31-47; 10:12-30; 10:50-11:42; 11:62-12:4; 12:47-14:40; 15:4-15:45; 16:1-36; 17:50-59; 18:8-13; 18:51-19:5; 21:28-38; 21:56-22:3; 22:60-63; 23:52-54; 24:24-25</p> <p>Figure 4, 6, 8-17</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action.</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p><u>Extrinsic:</u></p> <p>Random House Webster's Dictionary (2001) at 610</p> <p>Merriam Webster Online Dictionary (2014) ("Remote")</p>
logic	Executable instruction(s).	<p>All citations in this Exhibit A related to "CP logic," "CPP logic," or "personal agent logic" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 1:20-23; 2:32-43; 3:67-4:3; 4:17-31; 5:49-6:42; 6:51-52; 6:55; 7:31-36; 7:41-64; 8:1-24; 8:30-45; 8:54-9:8; 9:48-57; 9:67-10:2; 10:7-12; 10:19-30; 10:59-11:7; 11:16-52; 11:52-12:6; 13:36-42; 14-8-15; 14:20-27; 18:8-19; 18:32-34; 18:51-59; 19:6-9; 19:13-20; 22:4-17</p> <p>Figures 4-7, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p>

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		<p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Dictionary of Computing & Communications (2003) at 216</p> <p>Random House Webster's Dictionary (2001) at 424</p> <p>Merriam Webster Online Dictionary (2014) ("Logic")</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		Oxford Dictionaries Online (2014) ("Logic")
VCR controls	Controls for display of video content (e.g., PLAY, PAUSE, REWIND, STOP buttons).	<p>All citations in this Exhibit A related to "video play controls" or "control" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 5:35-6:3; 6:28-42; 17:33-40</p> <p>Figures 4, 8, 9, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p>

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		<p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Merriam Webster Online Dictionary (2014) (“Video”)</p> <p>Oxford Dictionaries Online (2014) (“Video”)</p>
video play controls	Controls for display of video content (e.g., PLAY, PAUSE, REWIND, STOP buttons).	All citations in this Exhibit A related to “VCR controls” or “control” are incorporated herein by

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 5:35-6:3; 6:28-42; 17:33-40</p> <p>Figures 4, 8, 9, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p><u>Extrinsic:</u></p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>Merriam Webster Online Dictionary (2014) (“Video” and “Play”)</p> <p>Oxford Dictionaries Online (2014) (“Video”)</p>
handset	A wireless communication device that supports radio access technology (e.g., Wi-Fi, GSM, CDMA).	<p>All citations in this Exhibit A related to “UE” or “personal agent” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 1:39-45; 2:25-31; 2:64-3:11; 3:42-44; 4:37-5:31; 5:35-48; 6:12-14; 6:25-31; 7:24-28; 9:48-57; 9:64-67; 10:7-13; 10:19-21; 10:31-35; 10:44-58; 12:11-15; 12:53-57; 12:65-13:9; 14:41-15:49; 16:66-17:3; 17:7-19; 17:25-40; 17:60-18:7; 18:32-34; 18:44-47; 20:46-54; 22:27-30; 22:52-59; 23:64-24:4</p> <p>Figures 2, 4, 8-12, 14-17</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner’s Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p>

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Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
serving node (Apple)	A serving element in the wide area network.	<p>All citations in this Exhibit A related to “network” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5:37-55; 6:14-36; 7:37-8:9; 8:19-22; 8:46-48; 10:12-18; 10:31-40; 10:56-58; 11:43-52; 12:11-23; 13:18-25; 13:30-31; 13:39-42; 13:51-63; 14:31-40; 17:60-63; 20:46-53; 21:48-55; 21:58-64; 22:18-21; 22:41-23:3; 23:18-23; 23:27-35; 23:52-54</p> <p>Figures 1-4, 6, 8-17</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner’s Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action.</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>IEEE Dictionary (1996) at 688-89</p> <p>The Telecommunications Fact Book and Illustrated Dictionary (2006) at 130</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>Dictionary of Telecommunications (1981) at 179</p> <p>The Telecommunications Illustrated Dictionary (2002) at 678</p> <p>Webster's New World Telecom Dictionary (2008) at 338</p> <p>Hargrave's Communications Dictionary (2001) at 355</p> <p>Dictionary of Computing & Communications (2003) at 252</p> <p>Oxford Dictionaries Online (2014) ("Node")</p> <p>Webster's New World Computer Dictionary (2003) at 257</p>
<p>the CP logic ... serves as a [first/second] proxy</p>	<p>The control point logic acts as an authorized actor.</p>	<p>All citations related to "CP logic" or "proxy" are incorporated by reference herein.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 2:61-67; 3:31-32; 3:45-57; 5:35-6:43; 6:63-67; 13:30-14:15; 15:50-16:42; 16:54-18:13; 19:23-25; 19:66-67; 20:23-30; 21:14-27; 22:22-30.</p> <p>Figures 1, 2, 4, 8-12, 14-17.</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p>

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		<p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>3/22/2012 Office Action</p> <p>2/13/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>8/3/2009 Amendments and Remarks</p> <p><u>Extrinsic:</u></p> <p>McGraw-Hill Illustrated Telecom Dictionary at 470</p> <p>The Telecommunications Illustrated Dictionary</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>(2002) at 749</p> <p>Webster's New World Telecom Dictionary (2008) at 393</p> <p>Hargrave's Communications Dictionary (2001) at 413</p> <p>Merriam Webster Online Dictionary (2014) ("Proxy")</p> <p>Oxford Dictionaries Online (2014) ("Proxy")</p> <p>Dictionary of Computing & Communications (2003) at 74 and 75</p> <p>Merriam Webster Online Dictionary (2014) ("Control")</p> <p>Oxford Dictionaries Online (2014) ("Control")</p> <p>Random House Webster's Dictionary (2001) at 155</p>
<p>the CPP logic ... serves as a [first/second] proxy</p>	<p>The control point proxy logic acts as an authorized actor.</p>	<p>All citations related to "CP," "logic," or "proxy" are incorporated by reference herein.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 2:61-67; 3:31-32; 3:45-57; 5:35-6:43; 6:63-67; 13:30-14:15; 15:50-16:42; 16:32-18:13; 17:7-18:13; 18:42-50; 19:23-25; 19:66-67; 20:23-30; 21:14-27; 22:22-30.</p> <p>Figures 1, 2, 4, 8-12, 14-17.</p> <p>The prosecution history of the '753 patent, including</p>

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		<p>McGraw-Hill Illustrated Telecom Dictionary at 470</p> <p>The Telecommunications Illustrated Dictionary (2002) at 749</p> <p>Webster's New World Telecom Dictionary (2008) at 393</p> <p>Hargrave's Communications Dictionary (2001) at 413</p> <p>Merriam Webster Online Dictionary (2014) ("Proxy")</p> <p>Oxford Dictionaries Online (2014) ("Proxy")</p> <p>Dictionary of Computing & Communications (2003) at 74 and 75</p> <p>Merriam Webster Online Dictionary (2014) ("Control")</p> <p>Oxford Dictionaries Online (2014) ("Control")</p> <p>Random House Webster's Dictionary (2001) at 155</p>
<p>negotiate media content delivery between the MS and the MR</p>	<p>Plain and ordinary meaning.</p>	<p>All citations in this Exhibit A related to "negotiate," "media content," "media server," or "media renderer" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 4:9-6:12; 6:35-42</p> <p>Figures 3-10, 12-17</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>9/21/2012 Amendments and Remarks</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>8/3/2009 Amendments and Remarks</p> <p><u>Extrinsic:</u></p> <p>The Telecommunications Fact Book and Illustrated Dictionary (2006) at 168</p> <p>Oxford Dictionaries Online (2014) ("Negotiate" and</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		“Server”)
<p>cooperate with (CP) logic to negotiate media content delivery between the MS and the MR” / “cooperate with the [network/serving node] CP logic</p>	<p>Plain and ordinary meaning.</p>	<p>All citations in this Exhibit A related to “CP,” “logic,” “network,” “control,” “negotiate,” “media content,” “media server,” “media renderer,” or “serving node” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5:35-6:43; 6:63-67; 13:30-14:15; 15:50-16:42; 16:54-18:13; 19:66-67; 20:23-30; 21:14-27; 22:22-30</p> <p>Figures 3-10, 12-17</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>12/22/2009 Examiner’s Amendment</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>9/21/2012 Amendments and Remarks</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>all figures</p> <p>7/24/2008 Office Action</p> <p><u>Extrinsic</u></p> <p>The Telecommunications Fact Book and Illustrated Dictionary (2006) at 130</p> <p>Dictionary of Telecommunications (1981) at 179</p> <p>The Telecommunications Illustrated Dictionary (2002) at 678</p> <p>Webster's New World Telecom Dictionary (2008) at 338</p>
resides in the signaling domain	Operates in the signaling domain.	<p>All citations in this Exhibit A related to "CP" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 1:51-59; 2:44-60; 3:45-50; 4:35-54; 6:47-48; 7:28-36; 9:12-17; 12:28-30; 13:25-29; 14:16-40; 18:1-7; 18:24-31; 22:31-36; 23:8-10</p> <p>Figures 1-7, 10-12, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>IEEE Dictionary (1996) at 988-992</p> <p>The Telecommunications Fact Book and Illustrated Dictionary (2006) at 168</p> <p>Dictionary of Telecommunications (1981) at 249</p> <p>The Telecommunications Illustrated Dictionary (2002) at 270</p> <p>Webster's New World Telecom Dictionary (2008) at 142, 438</p> <p>Hargrave's Communications Dictionary (2001) at 168, 469, 471</p> <p>Dictionary of Computing & Communications (2003) at 109, 343</p> <p>Merriam Webster Online Dictionary (2014) ("Reside," "Signal," and "Domain")</p> <p>Random House Webster's Dictionary (2001) at 209, 614, 668</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
control point (CP) logic	Control point executable instruction(s).	<p>All citations in this Exhibit A related to "CP" or "logic" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 5:35-6:43; 6:63-67; 13:30-14:15; 15:50-16:42; 16:54-18:13; 19:66-67; 20:23-30; 21:14-27; 22:22-30</p> <p>Figures 4-8, 10-12, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>Proxy: AYL0001285-1308</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Dictionary of Computing & Communications (2003) at 74 and 75</p> <p>Merriam Webster Online Dictionary (2014) (“Control”)</p> <p>Oxford Dictionaries Online (2014) (“Control”)</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		Random House Webster's Dictionary (2001) at 155
media renderer	Audiovisual content renderer.	<p>All citations in this Exhibit A related to “media” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5:42-6:42; 13:43-14:7; 15:14-27; 15:36-37; 16:14-17:59; 18:8-13; 18:42-50; 21:7-13; 22:22-47; 23:4-23; 23:62-63</p> <p>Figures 4, 10-12, 14-17</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no.</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p>
media server	Audiovisual content server.	<p>All citations in this Exhibit A related to “media” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5:35-6:42; 13:43-14:15; 16:14-17:59; 18:8-13; 21:48-22:3; 22:31-24:29</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>Figures 1, 4, 6-8, 10, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>3/8/2010 Amendments and Remarks</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>7/24/2008 Office Action</p> <p>2/6/2009 Amendments and Remarks</p> <p>4/21/2009 Office Action</p> <p>8/3/2009 Amendments and Remarks</p> <p>9/23/2009 Office Action</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>The Telecommunications Fact Book and Illustrated Dictionary (2006) at 168</p> <p>Random House Webster's Dictionary (2001) at 656</p>
personal agent logic	Executable instruction(s) on the UE.	<p>All citations in this Exhibit A related to "logic" or "UE" are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the '412 patent, including cols. 1:20-23; 2:32-43; 3:67-4:3; 4:17-31; 5:49-6:42; 6:51-52; 6:55; 7:31-36; 7:41-64; 8:1-24; 8:30-45; 8:54-9:8; 9:48-57; 9:67-10:2; 10:7-12; 10:19-30; 10:59-11:7; 11:16-52; 11:52-12:6; 13:36-42; 14-8-15; 14:20-27; 18:8-19; 18:32-34; 18:51-59; 19:6-9; 19:13-20; 22:4-17</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>Figures 1, 2, 4, 7-12, 14-17</p> <p>The prosecution history of the '753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner's Amendment</p> <p>The prosecution history of the '412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>2/13/2012 Office Action</p> <p>3/22/2012 Office Action</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>3/14/2013 Notice of Allowability</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no. 11/282,924, including the full specification, including all figures</p> <p>7/24/2008 Office Action</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
wide area network		See above
utilizing the wide area network for control	Utilizing an electronic communication network that connects nodes in a large geographical area for control.	<p>All citations in this Exhibit A related to “network” or “control” are incorporated herein by reference.</p> <p><u>Intrinsic:</u></p> <p>The specification of the ‘412 patent, including cols. 5:35-42; 17:7-32; 17:60-63; 18:32-41.</p> <p>Figures 1-6, 11-17.</p> <p>The prosecution history of the ‘753 patent, including 2/19/2009 Office Action</p> <p>8/19/2009 Amendment and Remarks</p> <p>12/22/2009 Examiner’s Amendment</p> <p>The prosecution history of the ‘412 patent, including 9/14/2011 Amendment to Claims and Remarks</p> <p>9/21/2012 Amendments and Remarks</p> <p>2/22/2013 Amendments to Claims</p> <p>The prosecution history of application no. 11/166,407, including the full specification, including all figures</p> <p>8/21/2009 Office Action</p> <p>The prosecution history of application no.</p>

Claim 2 Claim Term / Phrase	Avlus' Preliminary Construction	Intrinsic and Extrinsic Support
		<p>11/282,924, including the full specification, including all figures</p> <p>3/30/2010 Amendment and Remarks</p> <p>6/18/2010 Office Action</p> <p><u>Extrinsic:</u></p> <p>Dictionary of Computing & Communications (2003) at 74 and 75</p> <p>Merriam Webster Online Dictionary (2014) (“Control”)</p> <p>Oxford Dictionaries Online (2014) (“Control”)</p> <p>Random House Webster’s Dictionary (2001) at 155</p>

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I caused a true and correct copy of the foregoing to be served by
3 electronic mail upon the following:

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28 I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 17, 2014, at San Francisco, California.

/s/ William O. Cooper

William O. Cooper